

From: [Stuber, Robyn](#)
To: [Engle, Kelly](#)
Subject: FW: Review of draft LACSD Pomona WRP permit
Date: Wednesday, April 29, 2015 10:40:00 AM
Attachments: [Legal review request LACSD Pomona.xls](#)
[Pomona NPDES 07-14-2014 StaffWorkingDocument Tox.docm](#)
[Pomona Ammonia Data Calcs&SSO 07-11-2014.xlsx](#)
[PomonaWRP - Limit Comparison Table \(preliminary with Tox narrative\) 7-14....docx](#)

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From: Hung, David@Waterboards [mailto:David.Hung@waterboards.ca.gov]

Sent: Monday, July 14, 2014 10:49 AM

To: Stuber, Robyn; McChesney, Frances@Waterboards; Fordyce, Jennifer@Waterboards; Kuenzi, Nicole@Waterboards

Cc: Morris, Cris@Waterboards; Cuevas, Veronica@Waterboards

Subject: Review of draft LACSD Pomona WRP permit

Hi Robyn and legal team:

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Hope you all had a nice weekend. Attached please find a draft permit for LACSD Pomona WRP along with some supporting documents for your review. Veronica has provided significant highlights of the permit listed below and hope these help during your review. If you have any questions, please feel free to contact Veronica, Cris and me. We would really appreciate if you can provide us your comments on or before July 25th.

Hi Legal team: please let us know who is the assigned legal counsel to review this permit.
Thanks.

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Draft Permit highlights:

1. This draft permit used the recently adopted Camarillo WRP as a template.
2. Pomona only discharges into one watershed - San Gabriel River.
3. Pomona recycles/reuse 41% of the effluent for irrigation & industrial uses. The remaining discharge goes to the Montebello Forebay for groundwater recharge under a separate Order.
4. There are no new effluent limitations. The acute toxicity limit was deleted since the chronic toxicity narrative is more stringent.
5. Continues to implement the Ammonia 30-day SSO as did the 2009 permit.
6. This draft permit implements the chronic toxicity Pass/Fail monthly median trigger for accelerated monitoring.
7. This draft permit has TST-related monitoring requirements & QA/QC requirements for the monthly median, but does not have the daily maximum % effect limit.

Legal review list:

1. The permittee requested to remove section VI.A.2.I of Standard Provisions, page 13 of the Order. The deletion is requested because the Pomona WRP had filed a Notice of Intent to comply with the requirements of the State Water Board's General Permit for Storm Water

discharges associated with Industrial Activities CAS000001. However, we chose to keep it since we're supposed to protect the receiving waters from nuisance and it was included in other permits, even the Calleguas Creek POTW permits from May 2014.

2. The Permittee requested to insert a provision in section VI.C.5.b.vi (Pretreatment), page 21 of the draft Order and 5d (Filter Bypass), pages 21 & 22 of the draft Order. The pretreatment proposed language was previously used in the 2004 San Jose Creek WRP NPDES permit (R4-2004-0097). The Bypass language is requested to provide clarification for filter bypass conditions. This language was previously used in the 2002 NPDES permit for the Long Beach WRP but it was inadvertently not included in later permits.
3. I added language to MRP page E-2 w/r/t the transfer of the Drinking Water Program's ELAP from the California Department of Public Health (CDPH) to the State Water Board's new Division of Drinking Water.
4. The Permittee requested to insert a finding regarding "Performance Goals" on page F-16. This finding was included in Pomona's 1995 permit (Order 95-078), but was not carried forward in the current permit.
5. Anti-backsliding and antidegradation discussions.

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USEPA review list:

1. Ammonia effluent limitation
San Gabriel River Discharge (Discharge Point 001) – applies Basin Plan amendment 30-day SSO objective in the calculation of ammonia limits. Current 2009 permit effluent limitations were calculated in the same manner as this draft permit. Page F-29 As part of the triennial review process, the Regional Board was going to reconsider the continued appropriateness of the site-specific objectives in Resolution No. 2007-005, *Amendments to the Water Quality Control Plan-Los Angeles Region-To Incorporate Site-Specific Objectives for Select Inland Surface Waters in the San Gabriel River, Los Angeles River and Santa Clara River Watersheds*. Ginachi said it was not done since information was not presented to make them believe that the Resolution should not apply. Therefore, it is ok to continue using it.
2. Metals TMDLs (San Gabriel) calculations yield the same effluent limitations as compared to the current permit.
3. Chronic toxicity 1.0 TUc trigger from the current 2009 permit was replaced by Chronic Toxicity Pass/Fail Monthly Median trigger for accelerated monitoring. Please review page 8 of WDR for effluent requirement; page 11 of WDR for Receiving Water requirement; and page E-9 of the MRP.
4. Acute Toxicity limit was removed since the Chronic Toxicity narrative is more stringent implementing TST monitoring. Please see page E-10 of the MRP.
5. TST methodology is implemented, but rather than having a Median Monthly Effluent Limitation a Median Monthly Effluent Trigger is used. The Daily Maximum Effluent Limitation TST % Effect was not used. Please review Fact Sheet page F-46.